

LAW OFFICES OF JOSEPH P.H. AHUNA, JR.

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Attorneys for Plaintiff

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII

FAITH KEPAA;

Plaintiff,

v.

WALMART, INC. and DOE DEFENDANTS
1-100,

Defendants.

Civil No. CV 20-00295-JAO-KJM

PLAINTIFF'S INITIAL DISCLOSURES;
CERTIFICATE OF SERVICE

Trial Date: November 1, 2021

Trial Judge: Honorable Jill A. Otake

Magistrate Judge: Honorable Kenneth J.
Mansfield

PLAINTIFF'S INITIAL DISCLOSURES

Pursuant to Federal Rules of Civil Procedure, Rule 26, Plaintiff, by and through his attorneys, The Law Offices of Joseph PH Ahuna Jr., makes the following Initial Disclosures:

1. The name and, if known, the address and telephone number of each individual likely to have discoverable information – along with the subjects of that information – that the disclosing party may use to support its claims or defenses, unless the use would be solely for impeachment.

RESPONSE:

(a) Faith Kepaa, Plaintiff, c/o Law Office of Joseph P.H. Ahuna, Jr., Kaneohe

Atrium, 46-005 Kawa Street, Suite 307, Kaneohe, Hawaii 96744, (808)235-4000,

may have discoverable information regarding liability and damages.

- (b) Abigail Changes-Kepaa, 41-162 Nakini Street, Waimanalo, HI 96795, may have discoverable information regarding liability and damages.
- (c) Joan Chaves, 41 41-162 Nakini Street, Waimanalo, HI 96795 may have discoverable information regarding liability and damages.
- (d) Renee Kinoshita, Walmart employee, address unknown, may have discoverable information regarding liability and damages.
- (e) Scott Miscovich, MD, 46-001 Kamehameha Hwy Ste 109, Kaneohe, HI 96744, (808) 247-7596, may have discoverable information regarding liability and damages.
- (f) Gary Okamura, MD, Orthopedic Surgery of Hawaii, 1380 Lusitana St #903, Honolulu, HI 96813, (808) 550-0498, may have discoverable information regarding liability and damages.
- (g) Everett Wong, Enchanted Lake Physical Therapy, 1090 Keolu Dr, Kailua, HI 96734, (808) 262-2292, may have discoverable information regarding liability and damages.
- (h) Kaipo Lindsey, PA-C, Windward Urgent Care, 46-001 Kamehameha Highway, Suite 107, Kaneohe, HI 96744, (808) 234-1094, may have discoverable information regarding liability and damages.
- (i) Chib Vineet, MD, 640 Ulukahiki St, Kailua, HI 96734, may have discoverable information regarding liability and damages.
- (j) Albert Yeung, MD, Invision Imaging, 1010 S. King Street, Suite 109, Honolulu, HI 96814, (808) 593-8080, may have discoverable information regarding liability and damages.

- (k) Rosalyn Cheng, MD, Invision Imaging, 1010 S. King Street, Suite 109, Honolulu, HI 96814, (808) 593-8080, may have discoverable information regarding liability and damages.
- (l) Nansie Vanderhout, Fukuji and Lum PT, 407 Uluniu Street, Suite 301, Kailua, HI 96734, (808) 261-4321, may have discoverable information regarding liability and damages.
- (m) Gilbert Korenaga, MD, 4348 Waialae Avenue, Suite 5-509, Honolulu, HI 96816, , may have discoverable information regarding liability and damages.
- (n) Honolulu Spine Center, 500 Ala Moana Blvd Building 1, Suite 1, Honolulu, HI 96813, (808) 237-2970, may have discoverable information regarding liability and damages.
- (o) All names listed in Defendant's Initial Disclosures and amendments thereto, which Plaintiff incorporates by reference.
- (p) All names identified in the pleadings and subpoenaed records, which Plaintiff incorporates by reference.
- (q) All names, physicians, medical personnel, staff, employees, officers, and experts listed in all relevant documents, including but not limited to, police reports, statements, institutional files, correctional records, parole records, and medical records of all parties, which Plaintiff incorporates by reference.
- (r) Plaintiffs reserve the right to name other physicians, therapists, counselors, emergency technicians and medical personnel whose names are illegible and, thus, unreadable in the records and whose identity is made known.

- (s) Plaintiffs reserve the right to name other expert witnesses whose expertise may be needed after further discovery is completed on this matter, or substitute other witnesses designated by the witnesses listed above.
- (t) Plaintiffs reserve the right to name all nurses, medical technicians and all personnel involved in the treatment of Plaintiff listed in the medical records.
- (u) Plaintiff reserves the right to name an economist and vocational counselor on the issue of damages whose names will be identified in the normal course of discovery.
- (v) Any representatives of Plaintiff and Defendants who may have relevant information and whose names and identities are presently unknown.
- (w) Discovery is ongoing. Plaintiff will supplement discovery in the normal course.

2. A copy – or a description by category and location – of all documents, electronically stored information, and tangible things that the disclosing party has in its possession, custody, or control and may use to support its claims or defenses, unless the use would be solely for impeachment.

RESPONSE:

See documents marked KEPAA 1-150, which will be emailed to Defendant's counsel.

Discovery is ongoing. Plaintiff will supplement in the normal course of discovery.

3. A computation of each category of damages claimed by the disclosing party – who must also make available for inspection and copying as under Rule 34 the documents or other evidentiary material, unless privileged or protected from disclosure, on which each computation is based, including materials bearing on the nature and extent of injuries suffered.

RESPONSE:

The following is a summary of the medical bills Ms. Kepaa incurred as a result of the

accident.

<u>Provider</u>	<u>Total Cost</u>
Scott Miscovich, M.D.	\$ 1,636.85
Orthopedic Surgery (Gary Okamura)	5,171.34
Enchanted Lake PT (Everett Wong)	4,540.00
Windward Urgent Care	123.56
Fukuji and Lum PT (Vanderhout)	2,636.40
Honolulu Spine Center	51,789.90
Invision Imaging	2,310.00
CMC	253.00
Alissa Rosell PT	637.37
Calley, Nicholas	40.00
Cheng, Rosalyn	214.00
Doctors Medical LLC	995.92
Korenaga, Gilbert	<u>3,987.98</u>
	\$ 74,336.32

Discovery is ongoing. Plaintiff will supplement in the normal course.

4. For inspection and copying as under Rule 34, any insurance agreement under which an insurance business may be liable to satisfy all or part of a possible judgment in the action or to indemnify or reimburse for payments made to satisfy the judgment.

RESPONSE:

Not applicable.

Plaintiff reserves the right to supplement these disclosures as additional information is discovered.

DATED: Honolulu, Hawaii, September 2, 2020

/s/ David K. Ahuna
JOSEPH P.H. AHUNA, JR.
DAVID K. AHUNA

Attorneys for Plaintiff

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CERTIFICATE OF SERVICE

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I hereby certify that on this day a copy of the foregoing document was duly served electronically via CM/ECF upon filing on the following individuals:

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Attorneys for Defendant WALMART, INC.

DATED: Honolulu, Hawaii, September 2, 2020.

/s/ David K. Ahuna
JOSEPH P.H. AHUNA, JR.
DAVID K. AHUNA

Attorneys for Plaintiff